

11UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

**TQ DELTA, LLC,**

*Plaintiff,*

v.

**COMMSCOPE HOLDING COMPANY, INC.,  
COMMSCOPE INC., ARRIS US HOLDINGS,  
INC., ARRIS SOLUTIONS, INC., ARRIS  
TECHNOLOGY, INC., and ARRIS  
ENTERPRISES, LLC**

*Defendants.*

CIV. A. NO. 2:21-CV-310-JRG

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**DECLARATION OF ROSS R. BARTON IN SUPPORT OF  
COMMSCOPE'S RENEWED MOTION FOR  
JUDGMENT AS A MATTER OF LAW**

I, Ross R. Barton, declare:

1. I am a partner at Alston & Bird LLP, counsel of record for Defendants CommScope Holding Company, Inc., CommScope Inc., ARRIS US Holdings, Inc., ARRIS Solutions, Inc., ARRIS Technology (collectively, "CommScope"). I am over the age of 18 years, have personal knowledge of the matters in this declaration, and if called as a witness, I would and could competently testify to them.

2. Attached hereto as **Exhibit 36-A** is a true and correct copy of the [REDACTED]

[REDACTED].

3. Attached hereto as **Exhibit 36-B** is a true and correct copy of the [REDACTED]

[REDACTED].

4. Attached hereto as **Exhibit 37** is a true and correct copy of the [REDACTED]

[REDACTED]

5. Attached hereto as **Exhibit 38-A** is a true and correct copy of the [REDACTED]

6. Attached hereto as **Exhibit 38-B** is a true and correct copy of the [REDACTED]

7. Attached hereto as **Exhibit 40** is a true and correct copy of the [REDACTED]

8. Attached hereto as **Exhibit 65-A** is a true and correct copy of the [REDACTED]

9. Attached hereto as **Exhibit 65-B** is a true and correct copy of the [REDACTED]

10. Attached hereto as **Exhibit 68** is a true and correct copy of TQ Delta, LLC's Patent Statement and Licensing Declarations for ITU-T Recommendation.

11. Attached hereto as **Exhibit 74** is a true and correct copy of TQ Delta's DSL Technology Patent Portfolio.

12. Attached hereto as **Exhibit 78** is a true and correct copy of [REDACTED]

13. Attached hereto as **Exhibit 81** is a true and correct copy of [REDACTED]

14. Attached hereto as **Exhibit 124-B** is a true and correct copy of a letter from [REDACTED]

[REDACTED]

[REDACTED]).

15. Attached hereto as **Exhibit 135-B** is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]).

16. Attached hereto as **DDX-006** is a true and correct copy of Defendants' demonstratives for the direct examination of Stephen Becker, Ph.D.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 31, 2023, in Charlotte, North Carolina.

/s/ Ross R. Barton

Ross R. Barton